

SCANNED

DATE: 3-23-04 UNITED STATES DISTRICT COURT

BY: CML FOR THE DISTRICT OF MASSACHUSETTS

MA 0322 P 3:18

BRUNO HOFFMAN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

PHILIP LAUGHLIN, MICHAEL  
SABOLINSKI, ALBERT ERANI, DONNA  
ABELLI LOPOLITO, JOHN J. ARCARI,  
HERBERT M. STEIN, ALAN ADES,  
BERNARD A. MARDEN, ALAN W. TUCK,  
NOVARTIS PHARMA AG and  
PRICEWATERHOUSECOOPERS, LLP,

Defendants.

Civil Action No.: 1:04-CV-10027 (JLT)

CHRISTOPHER GERARD AHEE, Individually  
and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

PHILIP LAUGHLIN, MICHAEL  
SABOLINSKI, ALBERT ERANI, DONNA  
ABELLI LOPOLITO, JOHN J. ARCARI,  
HERBERT M. STEIN, ALAN ADES,  
BERNARD A. MARDEN, ALAN W. TUCK,  
NOVARTIS PHARMA AG and  
PRICEWATERHOUSECOOPERS LLP,

Defendants.

Civil Action No.: 1:04-CV-10517 (JLT)

**NOTICE OF MOTION OF LORENE CRAWFORD,  
ERIC D. WINKELMAN AS TRUSTEE FOR ERIC D.  
WINKELMAN TRUST, KENNETH WIENER, AND VICTOR KRAIEM  
FOR CONSOLIDATION OF THE RELATED ACTIONS, APPOINTMENT AS  
LEAD PLAINTIFFS, AND APPROVAL OF THEIR CHOICE OF LEAD COUNSEL**

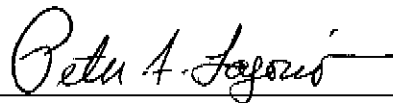
PLEASE TAKE NOTICE that Class members Lorene Crawford, Eric D.

Winkelman as Trustee for Eric D. Winkelman Trust, Kenneth Wiener, and Victor Kraiem ("Movants") hereby move this Court pursuant to Fed. R. Civ. P. 42(c) and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, at the United States District Court for the District Court of Massachusetts, located at 1 Courthouse Way, Boston, MA 02210, at a date and time to be determined by the Court, for an Order: (a) consolidating all of the above actions into one action for all purposes; (b) appointing Movants to serve as lead plaintiffs; and (c) approving Movants' selection of counsel for the Class.

In support of their motion, Movants submit: (a) the Declaration of Peter Lagorio, Esq., sworn to on March 22, 2004, and annexed exhibits; (b) a Memorandum of Law, dated March 22, 2004; and (c) a Proposed Order granting Movants' motion for consolidation, appointment of lead plaintiffs and approval of their selection of lead counsel for the Class.

Dated: March 22, 2004

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**Liaison Counsel for Movants and  
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**Counsel for Movants and**

**Proposed Lead Counsel for the Class**